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5 Interim Co-Lead Counsel for Plaintiff Class
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
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12 **In re: High-Tech Employee Antitrust
Litigation**

13 This Document relates to:

14 **All Actions**
15

Master Docket No. 11-CV-2509-LHK

**Declaration of Joseph R. Saveri Regarding
Compliance with the Court's June 5, 2012
Case Management Order**

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17 I, Joseph R. Saveri, declare as follows:

18 1. I am the Founding Partner of the Saveri Law Firm. I am one of the Court-
19 appointed Interim Co-Lead Counsel for Plaintiff Class in this matter. I previously appeared in this
20 matter on behalf of Plaintiffs during the time in which I was a partner at the law firm of Lieff,
21 Cabraser, Heimann & Bernstein, LLP. I submit this Declaration Regarding Compliance with the
22 Court's June 5, 2012 Case Management Order. If called as a witness, I could and would testify
23 competently to them.

24 2. Since its inception, I have been involved in all phases of litigation, including
25 discovery. Among other things, I have participated in responding to Defendants' requests for
26 production of documents, interrogatories and other discovery. I have personally participated in
27 meet and confer sessions with the Defendants. I have supervised the collection, inspection,
28 review and production of all reasonably accessible Plaintiffs' documents from paper and

1 electronic sources, including electronic mail and other web based systems operated by third
2 parties.

3 3. I have reviewed the Declaration of Dean Harvey Regarding Compliance with the
4 Court's June 5, 2012 Case Management Order. I can attest to the accuracy of the facts stated in
5 the Harvey Declaration. In particular, based upon my review of Defendants' discovery requests,
6 my participation in meet and confer sessions with Defendants as to the requests and my
7 personal involvement in Plaintiffs' counsels' efforts to comply with those requests, I reasonably
8 believe that Plaintiffs completed their investigation and believe, based upon that investigation,
9 that Plaintiffs have identified, gathered and produced all responsive, non-privileged documents
10 on Friday, June 15, 2012. If it comes to my attention that there are any documents which have
11 not been produced, they will be produced promptly.

12 I declare under penalty of perjury, under the laws of the United States, that the foregoing
13 is true and correct and that this Declaration is executed on June 18, 2012 at San Francisco,
14 California.

15 By: /s/ Joseph R. Saveri
16 Joseph R. Saveri
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